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Nominet Response to the National Telecommunications and Information Administration Request for Comments on the Internet Assigned Numbers Authority (IANA) Functions

Introduction

Nominet is the registry for the .uk country code top-level domain. With over nine million registered domains, we are the second largest country-code top-level domain. Over the years, we have been an active participant in ICANN and have been a member of the ccNSO since 2006.

Nominet has also been involved in the development of the responses from the ccNSO and from CENTR, both of which we strongly endorse and support.

Detailed Questions

1. **The IANA functions have been viewed historically as a set of interdependent technical functions and accordingly performed together by a single entity. In light of technology changes and market developments, should the IANA functions continue to be treated as interdependent? For example, does the coordination of the assignment of technical protocol parameters need to be done by the same entity that administers certain responsibilities associated with root zone management? Please provide specific information to support why or why not, taking into account security and stability issues.**

   We cannot currently see any clear reason for splitting the IANA function.

   We recognise that the functions could be separated, but we would note that combining these in a single contract ensures coherence. We believe that there is value – if only to ensure accountability – for all the elements of the IANA function to be carried out by a single contractor.

2. **The performance of the IANA functions often relies upon the policies and procedures developed by a variety of entities within the Internet technical community such as the IETF, the RIRs and IANA operators. Should the IANA functions contract include references to these entities, the policies they develop and instructions that the contractor follow the policies? Please provide specific information as to why or why not. If yes, please provide language you believe accurately captures these relationships.**

   We recognise that there are multiple organisations responsible for developing policies, and it would be useful to document this in the contract. We would suggest that there should also be a reference to the ccNSO which, within ICANN, has responsibility for relevant policy related to ccTLDs and the IANA.

   We are concerned that the documentation of policies and processes being used in the assignment of ccTLDs is not good, in spite of numerous requests for clarification.

The ccNSO has reviewed the policy associated with delegation, redelegation and retirement of ccTLDs and has identified that decisions made show inconsistent application of policies, guidelines and procedures, and on occasions that ICANN decisions have been based on criteria not included in the relevant policies, guidelines and procedures. This is of concern as decisions on the IANA should be logical and predictable.

The ccNSO has decided to establish a Framework of Interpretation Working Group to provide a clear guide to IANA and the ICANN Board on the interpretation of the current policies, guidelines and procedures relating to the delegation and re-delegation of ccTLDs and has agreed to establish a Policy Development Process to develop policies for the retirement of ccTLDs.

Similarly, the ccNSO has decided that further work needs to be done to improve the predictability of rules about "confusingly similar" strings in relationship to the fast track introduction of IDN ccTLDs.

3. **Cognizant of concerns previously raised by some governments and ccTLD operators and the need to ensure the stability of and security of the DNS, are there changes that could be made to how root zone management requests for ccTLDs are processed? Please provide specific information as to why or why not. If yes, please provide specific suggestions.**

For a number of years the performance of the IANA function for routine changes to the root zone was considered to be less than optimal. We welcome that there have been significant improvements in performance in the last few years.

There has been little feedback about introducing automation into the process, an initiative that has had significant community support. We would welcome early implementation of automation, which will be important to ensure that the system can handle the expected increased workload of the introduction of a large number of new gTLDs.

We would note that the IANA contract should recognise that the delegation of a ccTLD does not belong to the IANA manager. We strongly welcome the clear commitment that the US Government gave in its 2005 Principles on the Internet's Domain Name and Addressing System and in particular that, "The United States recognizes that governments have legitimate public policy and sovereignty concerns with respect to the management of their ccTLD." This principle was underlined by the World Summit on the Information Society's Tunis Agenda (paragraph 63).

In the light of these commitments, we have some concern at the way that some delegation requests appear to have been handled by ICANN. As noted above, the ccNSO is proposing to look at how to ensure a clear and predictable process.

In summary, we believe that:

1. As noted above, processes needs to be more clearly documented, in particular clarifying the grounds for rejection by the IANA contractor;
2. There should be clear transparency of process and accountability to the countries they are dealing with;

3. There should be a clear audit trail and published reports and documented Board discussions on decisions, except in exceptional circumstances;
4. There should be an opportunity for the TLD to appeal against a decision made by the IANA contractor, if this appears not to be in line with the specified policies and/or processes.

4. **Broad performance metrics and reporting are currently required under the contract.[1] Are the current metrics and reporting requirements sufficient? Please provide specific information as to why or why not. If not, what specific changes should be made?**

We welcome the clearly visible report on progress on dealing with requests to update the root-zone file on https://charts.icann.org/public/index-iana-main.html. However, we note that these statistics do not show any information about maximum and average time in the queue.

We are pleased to see that the Root Zone Cumulative Requests graph has a note explaining the increase in length of queue (a result of "increasingly complex root zone change requests"). It would, however, be useful to identify remedial action to respond to long-term trends.

It would be useful to make these statistics and performance against the service level specification more easily accessible. (We are aware that the IANA performance reporting page "is still under development, and fuller statistics will be available shortly." However, we find it surprising that contractually required data should not be easily identified on the IANA website.)

In current world terms, the processing metrics in the contract appear to be unnecessarily long.

When there is a serious issue over a delegation or redelegation request, the contractor should advise NTIA and all other concerned parties as to why there is an issue and publish general information about why

5. **Can process improvements or performance enhancements be made to the IANA functions contract to better reflect the needs of users of the IANA functions to improve the overall customer experience? Should mechanisms be employed to provide formalized user input and/or feedback, outreach and coordination with the users of the IANA functions? Is additional information related to the performance and administration of the IANA functions needed in the interest of more transparency? Please provide specific information as to why or why not. If yes, please provide specific suggestions.**

As noted above, we believe that:

- Automation of the process needs to be introduced as soon as possible and certainly before the introduction of new gTLDs significantly increase the number of requests for change.
- There needs to be substantially improved documentation on the policy and the processes that will be followed.

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[1] See Appendix A and Appendix B of the current contract, which can be viewed at http://www.ntia.doc.gov/ntiahome/domainname/iana/ianacontract_081406.pdf.

- There should be an opportunity for a TLD to appeal if a request is turned down without adequate explanation or if it appears to go beyond the established policies.

6. **Should additional security considerations and/or enhancements be factored into requirements for the performance of the IANA functions? Please provide specific information as to why or why not. If additional security considerations should be included, please provide specific suggestions.**

   The current process for requesting and verifying requests do not require signed communications. While we are not aware of any problems that this has caused, we are surprised that the request and verification process is not more secure.

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Nominet
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